

JOHN T. RICHARDS (SBN 159875)
EVAN WILLIS (SBN 314797)
RICHARDS WILLIS, PC
750 B Street, Suite 1760
San Diego, CA 92101
Telephone: (619) 237-9800
Facsimile: (760) 560-1697
Email: john@richardswillisp.com
evan@richardswillisp.com

Attorneys for Plaintiff
AHMER BILAL, INC. dba TIRE DEPOT

SONIA MARTIN (SBN 191148)
JEFFRY BUTLER (SBN 180936)
JONE TRAN (SBN 239311)
DENTONS US LLP
1999 Harrison Street, Suite 1300
Oakland, CA 94612
Telephone: (415) 882-5000
Facsimile: (415) 882-0300
Email: sonia.martin@dentons.com
jeffry.butler@dentons.com
jone.tran@dentons.com

Attorneys for Defendant
NATIONWIDE INSURANCE COMPANY
OF AMERICA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AHMER BILAL, INC. dba TIRE DEPOT,

Plaintiff,

vs.

NATIONWIDE INSURANCE COMPANY
OF AMERICA; and DOES 1 through 30,
inclusive,

Defendants.

Case No. 2:20-cv-00788-TLN-DMC

**STIPULATION AND ORDER TO
CONTINUE CASE DEADLINES**

Plaintiff Ahmer Bilal dba Tire Depot and defendant Nationwide Insurance Company of America, by and through their respective counsel of record, stipulate and agree as follows and respectfully request entry of an order giving effect to their stipulation:

WHEREAS, the parties stipulated to a case management schedule on August 5, 2021, which the Court approved in an August 6, 2021 order (*see* ECF Dkt. No. 9);

WHEREAS, according to the August 6, 2021 scheduling order, the discovery deadline is May 10, 2022 (*see* ECF Dkt. No. 9);

WHEREAS, the parties are exploring mediation as a means of resolving their disputes;

WHEREAS, a continuance of the discovery deadline and, as a result, other case deadlines is necessary to provide the parties with adequate time to explore potential case resolution and to avoid unproductive proceedings and unnecessary litigation costs;

WHEREAS, the parties agree that the interests of judicial economy, efficiency and convenience of the Court and the parties would be furthered by continuing the dates in the Court's August 6, 2021 order (ECF Dkt. No. 9) by 120 days, as follows:

	Original Deadline	Proposed Deadline (Adding 120 Days)
Non-Expert Discovery Cut-Off	Tuesday, May 10, 2022	Wednesday, September 7, 2022
Designation of Expert Witnesses	Monday, July 11, 2022	Tuesday, November 8, 2022
Designation of Rebuttal Experts	Wednesday, August 10, 2022	Thursday, December 8, 2022
Expert Discovery Cut-Off	Monday, August 8, 2022	Tuesday, December 6, 2022
Discovery Motion Hearing Cut-Off	Thursday, October 20, 2022	Friday, February 17, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

WHEREAS, the parties agree that all other case deadlines, including trial and motion deadlines, and dates imposed by order, local rules, or otherwise, shall be reset in accordance with the 120 day continuance requested;

NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

The deadlines in this matter, set forth in the Court's August 6, 2021 order and all other case deadlines be continued by 120 days as set forth in part in the table above, or as soon thereafter as the Court's calendar allows. Alternatively, the parties respectfully request that the Court set a further case management conference at which new dates may be selected.

The parties respectfully request the Court to adopt the foregoing stipulation as the order of the Court.

IT IS SO STIPULATED.

Dated: March 15, 2022

Respectfully submitted,

RICHARDS WILLIS, PC

By /s/ _____
EVAN WILLIS

Attorneys for Plaintiff
AHMER BILAL, INC. dba TIRE DEPOT

Dated: March 15, 2022

DENTONS US LLP

By /s/ _____
SONIA MARTIN

Attorneys for Defendant
NATIONWIDE INSURANCE COMPANY OF
AMERICA

DENTONS US LLP
1999 HARRISON STREET, SUITE 1300
OAKLAND, CA 94612
(415) 882-5000

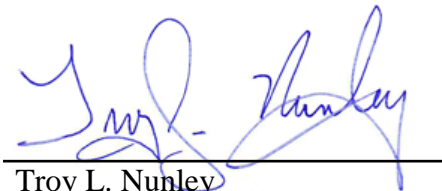
ORDER

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth in the Court's August 6, 2021 order and all other case deadlines by 120 days, in part, as follows:

Non-Expert Discovery Cut-Off	Wednesday, September 7, 2022
Designation of Expert Witnesses	Tuesday, November 8, 2022
Designation of Rebuttal Experts	Thursday, December 8, 2022
Expert Discovery Cut-Off	Tuesday, December 6, 2022
Discovery Motion Hearing Cut-Off	Friday, February 17, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions

IT IS SO ORDERED.

Dated: March 15, 2022



Troy L. Nunley
United States District Judge

DENTONS US LLP
1999 HARRISON STREET, SUITE 1300
OAKLAND, CA 94612
(415) 882-5000